

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In Re: Jennifer S Sidders

Chapter 13

Debtor

Case No. 2016-20600-GMH-13

Motion to Extend Time for Filing of Documents Required by 11 U.S.C. § 521 and Fed. R. of
Bankr. Pro. 1007(c)

The above-named Debtor, Jennifer S Sidders, by and through her attorneys, Miller and Miller Law Offices, LLC, hereby file this Motion to Extend Time. The following is shown to the Court in support of this motion:

1. The Debtor filed a voluntary Chapter 13 petition on January 8, 2016. The Debtor filed her petition without the schedules, plan and other necessary filings.
2. Counsel for the Debtor inquired as to the status of the financial information required to file her Chapter 13 plan and schedules. The Debtor is in the process of obtaining her financial information. Specifically, the Debtor's tax preparer is currently producing the 2014 and 2015 tax returns. The tax preparer expects to have them completed within the next one to two weeks.
3. The Debtor's counsel has a duty to perform a reasonable investigation into the circumstances that gave rise to the petition. 11 U.S.C. § 707(b)(4)(C).
4. The Debtor expects to have her bankruptcy schedules and Chapter 13 Plan completed by February 25, 2016.
5. The Debtor asserts that she can have her Chapter 13 plan and schedules completed and filed before the Meeting of Creditors on March 10, 2016.

Drafted by:

MILLER & MILLER LAW, LLC
735 W. Wisconsin Ave., Suite 600
Milwaukee, WI 53233
(414) 277-7742

WHEREFORE, the Debtor respectfully requests this Court to grant this Motion to Extend Time for filing the completed bankruptcy schedules and Chapter 13 Plan and extend the deadline to file all such documents to February 25, 2016.

Dated at Milwaukee, Wisconsin this 11th day of February, 2016.

/s/ _____

Miller and Miller Law, LLC
Attorneys for Debtor
By: Joseph LoCoco
State Bar No. 1084765